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Attorneys for Defendant Save On SP, LLC

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON HEALTH CARE SYSTEMS INC.,

Plaintiff,

v.

SAVE ON SP, LLC,

Civil Action No. 22-2632 (JKS)(CLW)

Document Electronically Filed

Return Date: October 7, 2024

NOTICE OF MOTION TO SEAL

Defendant.

PLEASE TAKE NOTICE on October 7, 2024, or a date and time to be set by the Court, Defendant Save On SP, LLC ("SaveOn"), by and through its attorneys Robinson & Cole, LLP and Selendy Gay PLLC, shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing portions of Johnson and Johnson Health Care Systems, Inc.'s ("J&J") August 9, 2024 Motion to Compel Document Retention Policies and Exhibits 1-4, 9-10

[ECF No. 349] and Exhibits 1-2, 4, 7-8 of SaveOn's Opposition [ECF No. 353]. This Motion is timely pursuant to Rule 5.3. All parties consent to the relief sought in this motion. Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of E. Evans Wohlforth, Jr., Esq. submitted herewith.

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**PLEASE TAKE FURTHER NOTICE** that, in support of the within motion, Defendant shall rely upon the Declaration of E. Evans Wohlforth, Jr., Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

**PLEASE TAKE FURTHER NOTICE** that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: September 9, 2024

By: s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr. Sabrina M. Galli

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